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TRAVEL 800

1-800-FLY-CHEAP



March 31, 1998

Federal Communications Commission
877 Symposium

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ladies & Gentleman of the commission -

I'd like to thank you for the opportunity to have our representative voice our concerns about the proposed 888 & 877 deployment plans. Travel 800 and it's mnemonic number 1-800-FLY-CHEAP, have been a tremendous success in the market place and are large users of toll free service. Currently, we answer approximately 12,000 calls a day and sell approximately 1.5 million dollars in airline tickets per week. We attribute our unparalleled growth to our number "1-800-FLY-CHEAP" this number tells consumers not only who we are, but also what we can do for them and how to contact us. The number has worked so well that we have not done any paid advertising since 1991, our first full year in business. The number is easily referred and once dialed by an individual it is retained by that individual for at least two years. Currently repeat and referrals account for 67% of our customers. No other marketing tool we have evaluated comes close to being this powerful.

We currently face buyer confusion from competitor's with mnemonic numbers which are 800's, like our's, but have different spellings. For example we are 1-800-FLY-CHEAP, C,H,E,A,P while a competitor has the number 1-800-FLY-CHEEP, C,H,E,E,P. We market 1-800-LOW-FARE while our competitor is 1-800-LOW-AIR-FARE. Our company has worked for 7 years to grow to over 70 million dollars in sales and done so by giving great service and a good value. Unfortunately, on a daily basis our less than esteemed competitors erode this work by being less than honest with their customers and encouraging confusion. This results in customers mistakenly calling us to rectify problems caused by our competitors. If the number 888-FLY-CHEAP is released to anyone other than our company, which has held the 888 number in replication, it would be an endorsement of buyer confusion by this commission.

I believe that the commission's true desire is to effectively implement and utilize the number's within the North American numbering plan. Your goal should be to do this while being consistent with established laws and business guidelines, and creating a fair and clearly understood market place.

One way to reach this goal would be to implement the 877 toll free prefix as a product specific prefix for the paging industry. This could be accomplished by immediately implementing the prefix for paging and over the course of the next 6-18 months phasing the existing pagers, which utilize 800 & 888 numbers, over to 877 numbers.

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In conjunction with this 877 roll out, 800 numbers could be deemed for business use while 888 numbers would be deemed for residential or non-commercial use. The commission is already faced with the task of educating phone users that the 877 prefix is toll free. With little or no additional expense the commission could, through telecommunications companies, educate the public as to these three distinct classifications and uses for toll free numbers: 800's for business, use, 888's for residential or non-commercial use, 877 for paging industry use.

This will clarify for consumers what they are going to get before they ever begin dialing a number on the phone. It also creates a workable implementation plan for already replicated 800 numbers. This plan lessens the possibility of buyer confusion and thus litigation between company's and companies and consumers. All of these things must be the goal of the commission in implementing the numbering plan efficiently and effectively. The North American numbering plan was initiated to serve the citizens of North America in the most efficient way possible ... lowering confusion in the market place and creating distinct prefixes for different market segments is the most efficient use of the numbering plan.

I encourage you to implement this type of plan so that you can be proud of your decision in the future. Thank you for allowing us this opportunity to voice our opinion.

Sincerely,

A handwritten signature in cursive script that reads "Tom Herrington". The signature is written in dark ink and is positioned above the printed name.

Tom Herrington
General Manager, 1-800-FLY-CHEAP